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16 *Attorney for Defendant Zachary L. Holt*

17 UNITED STATES DISTRICT COURT  
18 EASTERN DISTRICT OF WASHINGTON  
19

20  
21 UNITED STATES OF AMERICA,

22  
23 Plaintiff,

24 v.  
25

26 ZACHARY L. HOLT,

27  
28 Defendant.  
29  
30

No. 2:22-CR-0157-TOR-1

**DEFENDANT ZACHARY L.  
HOLT'S JOINDER IN  
DEFENDANT DEZMONIQUE D.  
TENZSLEY'S MOTION(S) FOR  
MISCELLANEOUS RELIEF**

**With Oral Argument:  
June 28, 2023 at 10:00 a.m.**

31 COMES NOW, Zachary Holt, by and through his attorneys of record,  
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1 Robert M. Seines and Carl J. Oreskovich of Etter, McMahon, Lamberson, Van  
2 Wert & Oreskovich, P.C., and hereby submits the following Joinder in  
3 Defendant Dezmonique Tenzsley's Motion(s) for Miscellaneous Relief. (See  
4 ECF No. 113)  
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8 In Defendant Tenzsley's Motion, he seeks an order compelling production  
9 of all discovery materials. There have been six separate discovery productions,  
10 the most recent being May 18, 2023. Although there are thousands of pages that  
11 have been produced, defense counsel are missing reports from various experts  
12 pertaining to fingerprints, ballistics, and blood analysis, as well as impeachment  
13 evidence pursuant to *Giglio* and *Brady*. Defendant Holt joins in Defendant  
14 Tenzsley's proposed discovery schedule of a 60-day deadline for the  
15 Government to produce the aforementioned discovery.  
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19 Defendant Holt also joins in Defendant Tenzsley's motion that the  
20 Government be compelled to provide defense counsel(s) with grand jury  
21 testimony pursuant to FRCP 26.2(a) and 18 U.S.C. §3500(b) within 60 days.  
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25 Lastly, Defendant Holt joins Defendant Tenzsley's Motion for Continuance  
26 and Extension of Time to File Motions. In anticipation of the production of the  
27 missing discovery in 60 days, defense counsel needs additional time to review  
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1 the documents that will be produced and retain their own experts. A  
2  
3 continuance of the trial date and the associated filing deadlines is necessary to  
4  
5 give defense counsel adequate time to prepare for trial.

6 Defendant Holt is in agreement with this Joinder and has indicated his  
7  
8 approval on the accompanying Waiver of Speedy Trial Rights.  
9

10 RESPECTFULLY SUBMITTED this 7th day of June, 2023.

11  
12 ETTER, McMAHON, LAMBERSON,  
13 VAN WERT & ORESKOVICH, P.C.

14  
15 By: /s/ Carl J. Oreskovich

16 Carl J. Oreskovich, WSBA #12779

17 ROBERT M. SEINES, ATTORNEY AT LAW

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19 By: /s/ Robert M. Seines

20 Robert M. Seines, WSBA #16046

21 *Attorneys for Defendant Holt*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the date indicated herein, I caused a true and correct copy of the foregoing to be filed with the Clerk of the Court using the CM/ECF System, which will send notification of such to all attorneys of record.

EXECUTED this 7th day of June, 2023 in Spokane, Washington.

By: /s/ Jodi Dineen  
Jodi Dineen